

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

UNITED STATES OF AMERICA,

Plaintiff,

v.

JEFFREY GRAY,
a/k/a "Dahmer,"

Defendant.

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Criminal Action No. 07-137-JJF

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GOVERNMENT'S REQUEST FOR SPECIAL VOIR DIRE

The Government, through undersigned counsel, hereby respectfully moves the Court to utilize the following questions when conducting voir dire in the above- captioned case:

1. Has any member of the panel or your immediate family (defined as your spouse, child, parent or sibling) or close friend had any business, social or personal dealings with either counsel – Ilana Eisenstein, Esquire, Keith Rosen, Esquire, or Joseph Gabay, Esquire – or with the United States Attorney's Office or the Law Offices of Joseph A. Gabay?
2. Has any member of the panel or your immediate family or close friend had any business, social or personal dealings with the defendant, Jeffrey Gray?
3. Members of the panel, I am now going to read the names of witnesses who may be called in this case [*witness lists to be provided*]. Does any member of the panel know any of these persons?
4. Has any member of the panel ever served as a juror in a criminal or a civil case or as a member of a grand jury in either a federal or state court?

5. Has any member of the panel ever been involved, in any court, in a criminal matter, other than a minor traffic offense, that concerned yourself, a member of your immediate family or a close friend, either as the subject of an investigation, a defendant, a witness, or a victim?
6. Has any member of the panel, a member of your immediate family, or a close friend had any dealings with – including being employed by, investigated by, or having any other association with – a law enforcement agency?
7. Would the fact that the Drug Enforcement Administration, the Bureau of Alcohol, Tobacco, Firearms and Explosives, and the Federal Bureau of Investigation are the primary investigating agencies in this case interfere with your ability to be fair and impartial?
8. This cases involves allegations regarding the possession of a firearm. Has any member of the panel had any experiences with firearms or does any member of the panel have views about firearms that would interfere with your ability to be fair and impartial?
9. This case involves various narcotics charges, including charges involving the distribution of cocaine. Is there anything about the nature of the charges that would prevent you from being an impartial juror?
10. Have you or any members of your family or friends been charged with a drug crime?
11. Do you believe that the use or sale of cocaine should be legalized?
12. Is there any member of the panel who has any special disability or problem that would make serving as a member of the jury difficult or impossible?

13. Having heard the questions put to you by the Court, does any other reason suggest itself to you as to why you could not sit on this jury and render a fair and impartial verdict based on the evidence presented to you and based on the Court's legal instructions?

Respectfully submitted,

COLM F. CONNOLLY
United States Attorney

BY: 
Ilana Eisenstein
Assistant United States Attorney

Dated: *May 9, 2008*